

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED
conditioned upon the
timely filing of a waiver
of speedy trial.

UNITED STATES OF AMERICA

v.

CHRISTOPHER SULLIVAN

No. 3:13-00086
Aleta A. Trauger
Judge, U.S. District Court



**CHRISTOPHER TROY SULLIVAN'S MOTION TO
CONTINUE THE TRIAL OF HIS CASE**

COMES now, the accused, **CHRISTOPHER TROY SULLIVAN**, through counsel, Assistant Federal Public Defender, Isaiah S. Gant and moves this Honorable Court to enter an Order continuing the trial in this matter, presently scheduled to commence on Tuesday, December 10, 2013, at 9:00 a.m. In support of the foregoing motion, it is respectfully represented to this Honorable Court the following:

1. Trial in this matter is scheduled to commence on Tuesday, December 10, 2013, at 9:00 a.m. Counsel for Mr. Sullivan is not in a position to proceed as scheduled.

2. Because Mr. Sullivan has yet to appear before this Court, the Court may not be aware that Mr. Sullivan has severe physical and behavioral challenges that make communication between counsel and client difficult.

3. Consequently, counsel for Mr. Sullivan has been challenged in terms of counsel's level of patience that would allow counsel to be as invested in the preparation of Mr. Sullivan's case as counsel should be.

4. Through no fault of Mr. Sullivan—who has always been cooperative and attentive during consultations—counsel for Mr. Sullivan has not been able to schedule a sufficient amount of quality time to devote to the preparation of Mr. Sullivan's case.

5. Consultation with Mr. Sullivan squeezed in during a weekday or, at the end of a long weekday at the cramped facility of the Davidson County Criminal Justice Center